

## **EXHIBIT A**

**MENAKER & HERRMANN LLP**

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**RIECK AND CROTTY, P.C.**

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*Counsel for Petitioners*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	:	
In re:	:	Chapter 11
DELPHI CORPORATION, et al.,	:	
	:	Case No. 05-44481 (RDD)
Debtors.	:	
	:	(Jointly Administered)
_____	:	

**FIRST SET OF INTERROGATORIES PURSUANT TO RULE 7033 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

To: John Wm. Butler, Jr.  
Skadden, Arps, Slate, Meagher & Flom, LLP  
333 West Wacker Drive, Suite 2100  
Chicago, Illinois 60606

Kayalyn A. Marafioti  
Skadden, Arps, Slate, Meagher & Flom, LLP  
Four Times Square  
New York, New York 10036

Pursuant to Rules 7033 of the Federal Rules of Bankruptcy Procedure,  
Petitioners, Mary P. O'Neill and Liam P. O'Neill, hereby request that Debtors, Delphi

Corporation and Delphi Automotive Systems LLC answer the following interrogatories within 30 days:

1. Please state the name of all insurers which have issued insurance policies that provide coverage for the claims asserted by Petitioners against Debtors or any one or more of them in the action entitled Mary P. O'Neill and Liam P. O'Neill v. General Motors Corp. et al., case number 03 L 7792 (hereinafter referred to as "State Court Litigation") and for each such insurance policy, please state the following information:

- A. The date the insurer issued the policy;
- B. The type of policy issued by the insurer;
- C. The limits of coverage of the policy;
- D. The amount of any self-insured retention or deductible applicable to the policy;
- E. Whether the policy provides first dollar of defense coverage; and
- E. Describe the obligations, in addition to any self-insured retention or deductible, imposed upon Debtors if the insurer pays Petitioners' claims against Debtors.

Respectfully submitted,

Petitioners, Mary P. O'Neill and Liam P. O'Neill

By: Maria E. Mazza  
One of their attorneys

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
DELPHI CORPORATION, et al.,	:	
	:	Case No. 05-44481 (RDD)
Debtors.	:	(Jointly Administered)
	:	

**NOTICE TO PRODUCE DOCUMENTS PURSUANT TO RULE 7034 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

To: John Wm. Butler, Jr.  
Skadden, Arps, Slate, Meagher & Flom, LLP  
333 West Wacker Drive, Suite 2100  
Chicago, Illinois 60606

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Four Times Square  
New York, New York 10036

Pursuant to Rules 7034 of the Federal Rules of Bankruptcy Procedure,  
Petitioners, Mary P. O'Neill and Liam P. O'Neill, hereby request that Debtors, Delphi

Corporation and Delphi Automotive Systems LLC produce the following documents within 30 days:

1. Any and all insurance policies issued to Debtors or to any one or more of them which provide coverage for the claims asserted by Petitioners against Debtors in the action entitled Mary P. O'Neill and Liam P. O'Neill v. General Motors Corp. et al., case number 03 L 7792 (hereinafter referred to as "State Court Litigation").

2. Documents sufficient to show debtors' interpretation of the scope of coverage of the insurance policies issued to Debtors which provide coverage for the claims asserted in the State Court Litigation.

3. Documents sufficient to show the nature of all of Debtors' obligations to every insurance carrier that issued insurance policies which provide coverage for the claims asserted in the State Court Litigation.

Respectfully submitted,

Petitioners, Mary P. O'Neill and Liam P. O'Neill

By: Maria E. Mazza  
One of their attorneys

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